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Attorneys for Defendant COUNTY OF SOLANO

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

ARIANA LYNN, A.E.S. a minor, by and)	Case No.: 2:23-cv-01738-JAM-SCR
through her guardian ad litem KRISTIN)	
McKENZIE, et al.,)	STIPULATION AND ORDER
)	MODIFYING THE PRETRIAL
Plaintiffs,)	SCHEDULING ORDER
)	
vs.)	
)	
COUNTY OF SOLANO, et al.,)	
)	
Defendants.)	
)	

The parties, by and through their respective counsel or record and subject to approval of the Court, hereby stipulate and respectfully request to modify and extend by four (4) months the below deadlines set forth in this Court's Status (Pre-trial Scheduling) Order dated December 15, 2023, (ECF No. 28).

Good cause exists for the modification because the parties have Petitioned the Solano County Juvenile Court to obtain otherwise confidential juvenile detention and adoption files. These files are critical to the parties' ability to engage in discovery and the parties' resolution of this case. To date, the parties have not received authorization from the Juvenile Court to access the juvenile court files and distribute them as part of the litigation discovery process. Given the current

discovery deadline in this case, the lack of juvenile court records makes reasonable discovery in this case extremely difficult if not impossible. Therefore, the parties seek the stipulated change in trial deadlines to allow for adequate time for discovery. The parties seek the following modifications:

<u>Event</u>	<u>Deadline</u>	<u>New Deadline</u>
Discovery Cutoff Date	02/07/2025	06/06/2025
Disclosure of Expert(s) Deadline	12/13/2024	04/11/2025
Supplemental Disclosure Deadline	12/27/2024	04/25/2025
Joint Mid-Litigation Statement Deadline	10/04/2024	04/07/2025
Dispositive Motion Filing Deadline	04/11/2025	08/08/2025
Dispositive Motion Hearing	06/17/2025 @ 1:00 p.m.	10/17/2025 @ 1:00 p.m.
Joint Pretrial Statement Deadline	07/24/2025	11/21/2025
Final Pretrial Conference	08/01/2025 @ 11:00 a.m.	12/1/2025 @ 11:00 a.m.
Jury Trial (10-12 days)	09/15/2025 @ 9:00 a.m.	01/12/2026 @ 9:00 a.m.

The parties request the above modifications for the reasons articulated above.

All other instructions contained in the December 15, 2023 Pretrial Scheduling Order (ECF No. 28) shall remain in effect.

Dated: November 20, 2024

ANGELO, KILDAY & KILDUFF, LLP

/s/ Robert K. Gaultney

By: _____
 SERENA M. WARNER
 ROBERT K. GAULTNEY
 Attorneys for Defendant COUNTY OF
 SOLANO

1
2 Dated: November 20, 2024

SMITH LAW OFFICE, LLP

3 /s/ John R. Byerly
4 (as authorized on 11.20.24)

5 By: _____
6 DOUGLAS C. SMITH
7 JOHN R. BYERLY
8 Attorneys for Defendants JAMES
9 HASKELL AND EMILY HASKELL

10
11 Dated: November 20, 2024

WALKUP, MELODIA, KELLY &
SCHOENBERGER

12 /s/ Valerie N. Rose
13 (as authorized on 11.20.24)

14 By: _____
15 KHALDOUN BAGHDADI
16 VALERIE N. ROSE
17 CLIFTON N. SMOOT
18 Attorneys for Plaintiffs ARIANA LYNN,
19 KRISTIN McKENZIE, and KIM
20 SPURGEON
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ORDER

Good cause having been shown, it is ordered that:

<u>Event</u>	<u>Deadline</u>	<u>New Deadline</u>
Discovery Cutoff Date	02/07/2025	06/06/2025
Disclosure of Expert(s) Deadline	12/13/2024	04/11/2025
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Joint Pretrial Statement Deadline	07/24/2025	11/21/2025
Final Pretrial Conference	08/01/2025 @ 11:00 a.m.	12/1/2025 @ 11:00 a.m.
Jury Trial (10-12 days)	09/15/2025 @ 9:00 a.m.	01/12/2026 @ 9:00 a.m.

IT IS SO ORDERED.

Dated: December 5, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE